

June 7, 2022

VIA CM/ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

**Re: Hotel 57 L.L.C. v. Integral Contracting Inc., Case No. 22-cv-2554
Joint Letter-Motion to Adjourn Initial Pretrial Conference**

Dear Judge Engelmayer:

We write on behalf of Plaintiff Hotel 57 L.L.C. ("Plaintiff") and Defendant Integral Contracting Inc. ("Defendant") in the above-captioned action to request a 29-day adjournment of the initial pretrial conference set for June 30, 2022 to July 29, 2022 (or the next date thereafter on which the Court is available).

On March 29, 2022, Plaintiff filed a three-count complaint against Defendant. (Complaint, Dkt. No. 1.) On May 27, 2022, Defendant filed an answer and counterclaim in response to the complaint. (Dkt. No. 14.) The following week, on June 2, 2022, the Court entered a Notice of Initial Pretrial Conference (the "Order"). (Dkt. No. 15.) In the Order, the Court set an initial pretrial conference for June 30, 2022 and addressed other matters related to the conference. (*Id.* at 1.) The Order instructed that any request to adjourn the conference must be made in writing at least two business days before the conference (*i.e.*, June 28, 2022).

Yesterday, on June 6, 2022, Defendant filed a third-party complaint naming two new parties, Paramount Painting Group, LLC ("Paramount") and Jolie Papier Ltd. ("Jolie"). (Dkt. No. 16.) Paramount and Jolie have not been formally served or filed an appearance yet.

In light of this development and to ensure a productive and efficient initial pretrial conference, Plaintiff and Defendant jointly request a short adjournment of the initial pretrial conference and associated deadlines set in the Order. Specifically, Plaintiff and Defendant request that the Court (1) adjourn the initial pretrial conference set for June 30, 2022 (Dkt. No. 15 at 1) to **July 29, 2022** or the next date thereafter on which the Court is available, and (2) correspondingly extend the deadline for the submission of the Civil Case Management Plan and Scheduling Order and the parties' joint pre-conference letter (*id.* at 2) from June 27, 2022 (*id.* at 2) to **July 26, 2022**. Doing so will provide the necessary time to obtain personal jurisdiction over the third-party defendants and thereafter provide all parties an opportunity to comply with their pre-conference

Hon. Paul A. Engelmayer
June 7, 2022
Page 2

obligations, confer with each other, draft the required joint submissions to the Court, and prepare appropriately for the conference.

No party has previously requested an adjournment or extension of any deadline or hearing in this matter.

Sincerely,

/s/ Gregory J. Scandaglia
Gregory J. Scandaglia (*pro hac vice*)
Joseph R. Swee (*pro hac vice*)
Craig Bolton
Counsel for Hotel 57, L.L.C.

/s/ Anthony P. DeCapua
Anthony P. DeCapua

Counsel for Integral Contracting Inc.

Granted. The initial pretrial conference in this case is adjourned to August 16, 2022 at 2:00 p.m.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
June 7, 2022